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January 16, 2025

**VIA CM/ECF & ELECTRONIC MAIL**

Hon. Katherine Polk Failla, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007  
Failla\_NYSDChambers@nysd.uscourts.gov

**MEMO ENDORSED**

Re: *Dow Jones & Co., Inc. et al. v. Perplexity AI, Inc.*, Civ. No. 24-7984 (KPF)

Dear Judge Failla:

We write on behalf of Plaintiffs Dow Jones & Company, Inc. and NYP Holdings, Inc. (together “Plaintiffs”) in the above-captioned action and submit this joint letter together with counsel for Defendant Perplexity AI, Inc. (“Perplexity” or “Defendant”) in accordance with the Court’s direction at the January 14, 2025, Pre-Motion Conference, *see* Minute Entry, January 14, 2025. The parties have met and conferred and jointly propose the following schedule for (i) Plaintiffs to file a Second Amended Complaint, which will amend Plaintiffs’ jurisdiction and venue allegations, and (ii) briefing on Defendant’s anticipated Motion to Dismiss, which was outlined in Defendant’s December 26, 2024, Pre-Motion Letter, ECF No. 39:

- Plaintiffs will file a Second Amended Complaint, amending the allegations that pertain to jurisdiction and venue, by no later than **January 28, 2025**;
- Defendant will file its Motion to Dismiss by no later than **February 18, 2025**;
- Plaintiffs will file their opposition to the Motion to Dismiss by no later than **March 11, 2025**; and
- Defendant will file its reply in further support of its Motion to Dismiss by no later than **March 25, 2025**.

If the proposed schedule is acceptable to the Court, we would ask that Your Honor “So Order” this joint letter. In addition, in accordance with the Court’s request, Plaintiffs have ordered a transcript of the Pre-Motion Conference and anticipate that a copy of the transcript will be available by the end of the week. The parties thank the Court for its continued attention to this matter.

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Respectfully submitted,

s/ Paul T. Cappuccio  
Paul T. Cappuccio  
Counsel for Plaintiffs

s/ James L. Day  
James L. Day  
Counsel for Defendant

cc: All counsel of record (via CM/ECF)

Application GRANTED. The parties shall adhere to the above schedule.

Dated: January 21, 2025  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE